

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of
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)
Telecommunications Relay Services,)
CC Docket No. 98-67)
and Speech-to-Speech Services for)
Individuals with Hearing and Speech)
Disabilities)
)
)

**COMMENTS OF THE WISCONSIN DEPARTMENT OF ELECTRONIC
GOVERNMENT**

The Voice Section staff of the State of the Wisconsin Department of Electronic Government (DEG), submits these comments to support the Petition for Clarification Provision of and Cost Recovery for CapTel, an enhanced VCO service, filed by Ultratec, Inc. (Ultratec) on April 12, 2002 (Petition).

The Administration of Governor McCallum's vision for DEG is guided by three principles: government should be citizen-centered, results-oriented and market-based. To reinforce the DEG's vision, the DEG has been involved in the CapTel trial project with its current Telecommunications Relay Service contractor – Hamilton since October 1, 2001. Hamilton is a participant along with its sub-contractor Ultratec in the CapTel trial in the State of Wisconsin as trials described in the Petition.

CapTel is a new computer-based voice recognition technology developed by Ultratec, Inc of Madison. It is a new captioned telephone being built on the voice recognition technology by providing users with sound and text at the same time, much

like a closed captioning (CC) television. The CapTel displays word-for-word text of everything the caller says. Users can listen to the caller's voice while reading a transcription on the CapTel's built-in display. In addition, users are automatically connected to a captioning service, so there is no need to set up the call or make arrangements with an operator. Because the service "feels" more like using conventional voice telephone service, with direct dialing of the called party's number and simultaneous delivery of the actual voice and the written version generated when the CA re-voices the message, it is less intrusive and more "natural" for the call participants. This would help speed up the conversation and improve the accuracy of the conversation between two parties. Users who become hearing impaired later in life find it easier to adjust to CapTel. Users with residual ability to hear are able to supplement what they hear with the text display. By reaching a segment that has traditionally been reluctant to use relay, The CapTel user gets both voice and text over one line; there is no need or cost for an additional telephone line or any other equipment. The telephone set can be used by anyone by simply turning off the caption feature to use it as a traditional telephone, saving the cost of separate equipment

As the preliminary result of the trial, the Wisconsin trial has met with encouraging success and acceptance. The CapTel makes use of voice recognition applications to dramatically improve both speed (from 200% faster) and accuracy (five times more accurate), over traditional telecommunication relay service performance.

Four months into the CapTel trial, a survey of trial participants was conducted. One hundred surveys were mailed to Wisconsin trial participants with a 62% response rate.

Of those that responded:

- 100% of those who work outside the home reported CapTel assists them in doing their job more independently and effectively.
- 86% reported smooth call handling of recordings/interactive menu systems.
- 89% responded that they are more comfortable using the telephone.
- 95% stated CapTel gives them more control of their conversation.

The technology advances the TRS service significantly bringing it closer to “functionally equivalent” with the capabilities of hearing individuals. The experience is almost real-time with much greater translation accuracy. Consequently, the TRS provided by the State of Wisconsin is a more attractive option for thousands of people who currently wouldn’t use relay (seniors losing their hearing, younger people with hearing loss who don’t have TTYs, those intimidated by computers, etc.). Additionally, there is a reduction of carpal tunnel injury to employees who provide traditional relay services. It allows these individuals to become more productive and make better use of time as using these technologies takes a fraction of the time needed to have a conversation compared to traditional relay.

FCC encourages the development of innovative telecommunications relay service (TRS) technology and has adopted general principle to use to evaluate both waiver from FCC’s mandatory minimum relay requirements and reimbursement for these services. FCC’s principle is consistent with Ultratec’s requests to recognize as an enhanced Voice Carryover (VCO) in TRS that merits speedy approval for cost recovery as a "functionally

equivalent" relay service advancing the objectives of Title IV of the Americans with Disabilities Act (ADA) and (2) that the standards identified by Ultratec.

CapTel is an innovative telecommunication relay service (TRS) technology such as improved typing speed, simultaneous voice and text over one line, and more normal conversation tempo. It is consistent with the FCC's treatment of waivers from mandatory minimum standards, and should be treated as cost-reimbursement for non-traditional service equally.

Therefore, the DEG strongly recommends that the Commission consider CapTel be recognized as an enhanced VCO and that providers be reimbursed for implementing such service.

Respectfully submitted,

Voice Section of Bureau of Network of Department of Electronic Government

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